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May 11, 2018

By ECF and Facsimile

The Honorable Naomi Reice Buchwald
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

RE: *In re LIBOR-Based Financial Instruments Antitrust Litigation*, 11-MD-2262 (NRB)

Dear Judge Buchwald:

Pursuant to the Court's Order of May 8, 2018, we write jointly¹ to propose a briefing schedule for the filing of amended complaints and accompanying motions in all actions, including previously stayed actions. The parties have agreed on and propose the following dates:

June 15, 2018: Plaintiffs file Amended Complaints (for those amendments as of right) and Motions for Leave to File Amended Complaints, along with Proposed Amended Complaints.

July 10, 2018: Defendants file Motions to Dismiss Amended Complaints or Oppositions to Motions for Leave to File Amended Complaints.²

August 16, 2018: Plaintiffs file Oppositions to Motions to Dismiss Amended Complaints or Replies to Motions for Leave to File Amended Complaints.

August 24, 2018: Defendants file Replies to Motions to Dismiss Amended Complaints.

The parties will file coordinated briefs on common issues on their respective sides so as to promote efficiency and eliminate duplication in the briefing process.

¹ Each Defendant joins this letter to the extent (and only to the extent) that such Defendant is currently a nondismissed defendant named in any action (including any stayed action) within the MDL. By joining this letter, no Defendant consents to personal jurisdiction or venue in any action, including any action where (i) that defense has been asserted, (ii) a Defendant has not had an opportunity to assert that defense, including in the stayed cases, or (iii) the Court dismissed a claim against Defendants before a personal jurisdiction defense became available. For the avoidance of doubt, Defendants that have been dismissed from all non-stayed actions join this letter only to the extent that it pertains to stayed actions in which they have been named as Defendants and that have not yet been the subject of motions to dismiss. Defendants also expressly reserve all jurisdictional defenses available to them, including jurisdictional objections to discovery.

² To the extent Defendants consent to the amendment of any complaints subject to a motion for leave to amend filed by June 15, 2018, those Defendants shall move to dismiss those amended complaints by July 10, 2018.

The Honorable Naomi Reice Buchwald
May 11, 2018
Page 2

Sincerely,

/s/ James R. Martin
James R. Martin
Direct Action Plaintiffs' Liaison Counsel

/s/ Arthur J. Burke
Arthur J. Burke
Defendants' Liaison Counsel

cc: All Counsel (via ECF)